

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ROBERT SOKOLOVE, DAVID)	
MCCARTHY, WILLIAM SHIELDS,)	Case No. 05-514
and CITIZENS FOR REHOBOTH)	
BEACH, a political committee,)	
)	
Plaintiffs,)	
)	
v.)	
)	
CITY OF REHOBOTH BEACH,)	
DELAWARE and GREGORY FERRESE,)	
individually and as Manager of the City of)	
Rehoboth Beach, Delaware)	

NOTICE OF SERVICE

TO: Daniel A. Griffith, Esquire	Todd C. Schiltz, Esquire
Marshall Dennehey Warner	Wolf Block Schorr and Solis-Cohen LLP
Coleman & Goggin	Wilmington Trust Center, Suite 1001
1220 Market Street, 5th Floor	1100 North Market Street
P.O. Box 8888	Wilmington, DE 19801
Wilmington, DE 19899-8888	

PLEASE TAKE NOTICE that I, Chase T. Brockstedt, Esquire, do hereby certify that on this 14th day of March, 2006, two copies of the foregoing **PLAINTIFFS'**, **ROBERT SOKOLOVE, DAVID MCCARTHY AND WILLIAM SHIELDS, FIRST SET OF INTERROGATORIES DIRECTED TO DEFENDANTS.**

MURPHY SPADARO & LANDON

/s/ Chase T. Brockstedt
ROGER D. LANDON, ID No. 2460
CHASE T. BROCKSTEDT, ID No. 3815
PHILIP T. EDWARDS, ID No. 4393
1011 Centre Road, #210
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(302) 472-8100
Attorneys for Plaintiffs
Robert Sokolove, David McCarthy
and William Shields

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**PLAINTIFFS', ROBERT SOKOLOVE, DAVID MCCARTHY & WILLIAM
SHIELDS, FIRST SET OF INTERROGATORIES
DIRECTED TO ALL DEFENDANTS**

INSTRUCTIONS

Throughout these interrogatories, whenever you are requested to "identify" a communication of any type, and such communication was oral, the following information should be furnished:

- (a) By whom it was made and to whom it was directed;
- (b) Its specific subject;
- (c) The date upon which it was made;
- (d) Who else was present when it was made;
- (e) Whether it was recorded, described or summarized in any writing of any

type; if so, identify each such writing in the manner indicated above.

Whenever you are requested to "identify" a communication, memorandum or record of any type, and such communication was written, the following information should be furnished (in place of identification, production is acceptable):

- (a) Its nature, e.g. letter, memorandum, telegram, note, drawing, etc.;
- (b) Its specific subject;
- (c) By whom it was made and to whom it was directed;
- (d) The date upon which it was made;
- (e) Who has possession of the original and any copies.

Whenever a person is to be "identified", you should furnish, except as otherwise noted:

- (a) Name and present or last known address, and
- (b) If a corporation, the state of incorporation.

INTERROGATORIES

1. State the factual and legal basis for the "First Separate Defense" as stated in Defendants' Answer to Plaintiffs' Amended and Supplemental Verified Complaint with Separate Defenses, and produce all documents related to such defense.

2. State the factual and legal basis for the "Second Separate Defense" as stated in Defendants' Answer to Plaintiffs' Amended and Supplemental Verified Complaint with Separate Defenses, and produce all documents related to such defense.

3. State the factual and legal basis for the "Third Separate Defense" as stated in Defendants' Answer to Plaintiffs' Amended and Supplemental Verified Complaint with Separate Defenses, and produce all documents related to such defense.

4. State the factual and legal basis for the "Four Separate Defense" as stated in Defendants' Answer to Plaintiffs' Amended and Supplemental Verified Complaint with Separate Defenses, and produce all documents related to such defense.

5. State the factual and legal basis (understanding Defendants bear the burden of proof) for the "Fifth Affirmative Defense" as stated in Defendants' Answer to Plaintiffs' Amended and Supplemental Verified Complaint with Separate Defenses, and produce all documents related to such defense.

6. State the factual and legal basis (understanding Defendants bear the burden of proof) for the "Sixth Affirmative Defense" as stated in Defendants' Answer to Plaintiffs' Amended and Supplemental Verified Complaint with Separate Defenses, and produce all documents related to such defense.

7. State the factual and legal basis (understanding Defendants bear the burden of proof) for the "Seventh Affirmative Defense" as stated in Defendants' Answer to Plaintiffs' Amended and Supplemental Verified Complaint with Separate Defenses, and produce all documents related to such defense.

8. State the factual and legal basis (understanding Defendants bear the burden of proof) for the "Eighth Affirmative Defense" as stated in Defendants' Answer to Plaintiffs' Amended and Supplemental Verified Complaint with Separate Defenses, and produce all documents related to such defense.

9. State the factual and legal basis (understanding Defendants bear the burden of proof) for the "Ninth Affirmative Defense" as stated in Defendants' Answer to Plaintiffs' Amended and Supplemental Verified Complaint with Separate Defenses, and produce all documents related to such defense.

MURPHY SPADARO & LANDON

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March 14, 2006

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CERTIFICATE OF SERVICE

I, Chase T. Brockstedt, Esq., do hereby certify that on this 14th day of March, 2006, two copies of the foregoing **PLAINTIFFS', ROBERT SOKOLOVE, DAVID MCCARTHY AND WILLIAM SHIELDS, FIRST SET OF INTERROGATORIES DIRECTED TO DEFENDANTS** were delivered via First Class Mail to the following individual(s):

Daniel A. Griffith, Esquire
Marshall Dennehey Warner
Coleman & Goggin
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